UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Civil Action No. 05-30046-KPN

ALICE W. HALPIN,

Plaintiff,

v.

RDC OF CONNECTICUT, INC., R.D. CLARK AND SONS, INC., KATELAND LEASING, INC., PINNACLE TRANSPORTATION, INC. and CHINA GROVE TRANSPORT, INC.,

Defendants.

CASE MANAGEMENT REPORT PURSUANT TO LOCAL RULE 16(2)

In accordance with the United States District Court for the District of Massachusetts

Local Rule 16.3(b), counsel for the Plaintiff and the Defendants have conferred concerning the

progress of discovery in this matter. To date, the parties have made the required disclosures

called for in Rule 26 of the Federal Rules of Civil Procedure and have exchanged written

discovery and responses and have conducted several fact witness depositions, one of which is

scheduled to conclude the week of February 6, 2006.

The counsel for the Plaintiff and the Defendants request an extension of the time set forth for deposition-of-fact witnesses and the time for completion of depositions of expert

witnesses in the joint discovery plan for 90 days each and that the time for filing motions in the case and the final pretrial conference be moved accordingly at the discretion of the Court.

Respectfully submitted,

ALICE HALPIN,

Plaintiff

Her Attorneys

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February 2, 2006

RDC OF CONNECTICUT, INC., R.D. CLARK & SONS, INC., KATELAND LEASING, INC., PINNACLE TRANSPORTATION, INC. and CHINA GROVE TRANSPORT, INC.,

Defendants

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February Z 2006